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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Fawaz Khouri,

11 Plaintiff,

12 v.

13 Equifax Information Services, LLC; Experian  
14 Information Solutions, Inc.; CKS Prime  
15 Investments, LLC a/k/a CKS Prime  
16 Investment; Velocity Portfolio Group, Inc.;  
and CKS Financial, LLC a/k/a CKS  
Financial;

17 Defendants.

Case No. 2:21-cv-02162-CDS-NJK

**STIPULATED PROTECTIVE ORDER**

Complaint filed: December 8, 2021

18 IT IS HEREBY STIPULATED by and between Plaintiff Fawaz Khouri (“Plaintiff”) and  
19 Defendants Experian Information Solutions, Inc. (“Experian”), CKS Prime Investments, LLC  
20 a/k/a CKS Prime Investment; Velocity Portfolio Group, Inc.; and CKS Financial, LLC a/k/a CKS  
21 Financial; through their respective attorneys of record, as follows:

22 WHEREAS, documents and information have been and may be sought, produced or  
23 exhibited by and among the parties to this action relating to trade secrets, confidential research,  
24 development, technology or other proprietary information belonging to the defendants, and/or  
25 personal income, credit and other confidential information of Plaintiff.

26 THEREFORE, an Order of this Court protecting such confidential information shall be and  
27 hereby is made by this Court on the following terms:  
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1           1.       This Order shall govern the use, handling and disclosure of all documents,  
2 testimony or information produced or given in this action which are designated to be subject to  
3 this Order in accordance with the terms hereof.

4           2.       Any party or non-party producing or filing documents or other materials in this  
5 action (the “Producing Party”) may designate such materials and the information contained  
6 therein subject to this Order by typing or stamping on the front of the document, or on the  
7 portion(s) of the document for which confidential treatment is designated, “Confidential.”

8 **See order issued concurrently herewith.**  
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13           4.       All documents, transcripts, or other materials subject to this Order, and all  
14 information derived therefrom (including, but not limited to, all testimony given in a deposition,  
15 declaration or otherwise, that refers, reflects or otherwise discusses any information designated  
16 “Confidential” hereunder), shall not be used, directly or indirectly, by any person , including the  
17 other Defendants, for any business, commercial or competitive purposes or for any purpose  
18 whatsoever other than solely for the preparation for and trial of this action in accordance with the  
19 provisions of this Order.

20           5.       Except with the prior written consent of the individual or entity designating a  
21 document or portions of a document as “Confidential,” or pursuant to prior Order after notice,  
22 any document, transcript or pleading given “Confidential” treatment under this Order, and any  
23 information contained in or derived from any such materials (including but not limited to, all  
24 deposition testimony that refers to, reflects or otherwise discusses any information designated  
25 “Confidential” hereunder) may not be disclosed other than in accordance with this Order and  
26 may not be disclosed to any person other than: (a) the Court and its officers; (b) parties to this  
27 litigation; (c) counsel for the parties, whether retained outside counsel or in-house counsel and  
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1 employees of counsel assigned to assist such counsel in the preparation of this litigation; (d) fact  
2 witnesses subject to a proffer to the Court or a stipulation of the parties that such witnesses need  
3 to know such information; (e) present or former employees of the Producing Party in connection  
4 with their depositions in this action (provided that no former employees shall be shown  
5 documents prepared after the date of his or her departure); and (f) experts specifically retained as  
6 consultants or expert witnesses in connection with this litigation.

7         6. Documents produced pursuant to this Order shall not be made available to any  
8 person designated in Subparagraph 5(f) unless he or she shall have first read this Order, agreed to  
9 be bound by its terms, and signed the attached “Declaration of Compliance” (Exhibit A).

10         7. All persons receiving any or all documents produced pursuant to this Order shall  
11 be advised of their confidential nature. All persons to whom confidential information and/or  
12 documents are disclosed are hereby enjoined from disclosing same to any person except as  
13 provided herein, and are further enjoined from using same except in the preparation for and trial  
14 of the above-captioned action between the named parties thereto. No person receiving or  
15 reviewing such confidential documents, information or transcript shall disseminate or disclose  
16 them to any person other than those described above in Paragraph 6 and for the purposes  
17 specified, and in no event shall such person make any other use of such document or transcript.

18         8. Nothing in this Order shall prevent a party from using at trial any information or  
19 materials designated “Confidential.”

20         9. This Order has been agreed to by the parties to facilitate discovery and the  
21 production of relevant evidence in this action. Neither the entry of this Order, nor the  
22 designation of any information, document, or the like as “Confidential,” nor the failure to make  
23 such designation, shall constitute evidence with respect to any issue in this action.

24         10. Within sixty (60) days after the final termination of this litigation, all documents,  
25 transcripts, or other materials afforded confidential treatment pursuant to this Order, including  
26 any extracts, summaries or compilations taken therefrom, but excluding any materials which in  
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1 the good faith judgment of counsel are work product materials, shall be returned to the Producing  
2 Party.

3 11. In the event that any party to this litigation disagrees at any point in these  
4 proceedings with any designation made under this Protective Order, the parties shall first try to  
5 resolve such dispute in good faith on an informal basis. If the dispute cannot be resolved, the  
6 party objecting to the designation may seek appropriate relief from this Court. During the  
7 pendency of any challenge to the designation of a document or information, the designated  
8 document or information shall continue to be treated as “Confidential” subject to the provisions  
9 of this Protective Order.

10 12. Nothing herein shall affect or restrict the rights of any party with respect to its  
11 own documents or to the information obtained or developed independently of documents,  
12 transcripts and materials afforded confidential treatment pursuant to this Order.

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13. The Court retains the right to allow disclosure of any subject covered by this stipulation or to modify this stipulation at any time in the interest of justice.

Dated this 12th day of July 2022.

Respectfully submitted,

STEIN SAKS, PLLC

NAYLOR & BRASTER

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By: /s/ Benjamin Gordon

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CKS Financial, LLC*

IT IS SO ORDERED.

Dated: July 13, 2022

  
UNITED STATES MAGISTRATE JUDGE

**EXHIBIT A**

**DECLARATION OF COMPLIANCE**

I, \_\_\_\_\_, declare as follows:

1. My address is \_\_\_\_\_.

2. My present employer is \_\_\_\_\_.

3. My present occupation or job description is \_\_\_\_\_.

4. I have received a copy of the Stipulated Protective Order entered in this action on \_\_\_\_\_, 20\_\_\_\_.

5. I have carefully read and understand the provisions of this Stipulated Protective Order.

6. I will comply with all provisions of this Stipulated Protective Order.

7. I will hold in confidence, and will not disclose to anyone not qualified under the Stipulated Protective Order, any information, documents or other materials produced subject to this Stipulated Protective Order.

8. I will use such information, documents or other materials produced subject to this Stipulated Protective Order only for purposes of this present action.

9. Upon termination of this action, or upon request, I will return and deliver all information, documents or other materials produced subject to this Stipulated Protective Order, and all documents or things which I have prepared relating to the information, documents or other materials that are subject to the Stipulated Protective Order, to my counsel in this action, or to counsel for the party by whom I am employed or retained or from whom I received the documents.

10. I hereby submit to the jurisdiction of this Court for the purposes of enforcing the Stipulated Protective Order in this action.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Executed this \_\_\_\_ day of \_\_\_\_\_, 20\_\_, at \_\_\_\_\_.

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5 [QUALIFIED PERSON]  
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